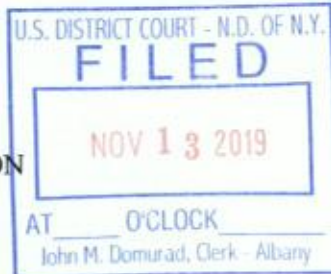


Roger Strauch
THE MOSSE FOUNDATION
2217 5th Street
Berkeley, CA 94710-2216
Telephone: (510) 649-1900



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ONE PAINTING ENTITLED "WINTER,"
aka "SKATERS" aka "SNOW,"

Defendant.

Case No. 1:19-cv-1271 (MAD/CFH)

**CLAIMANT'S ANSWER TO
VERIFIED COMPLAINT FOR
FORFEITURE *IN REM***

Claimant THE MOSSE FOUNDATION, by its Trustee ROGER STRAUCH, on behalf of itself, JOY MOSSE, and the UNIVERSITY OF WISCONSIN, as Successor to Felicia Lachmann-Mosse, sole heir to Rudolf Mosse (hereafter "Claimant"), answers Plaintiff UNITED STATES OF AMERICA's Verified Complaint for Forfeiture *In Rem* against the painting entitled, "Winter" aka "Skaters" aka "Snow," by the artist Gari Melchers.

1. Claimant admits the allegations contained in paragraphs 1 through 26.
2. Claimant admits the allegations contained in paragraphs 27 through 33 on information belief.

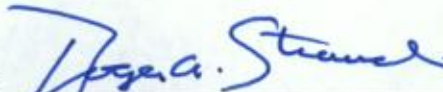
PRAYER

WHEREFORE, Claimant prays that the Court enter judgment directing that the above-described painting be forfeited and returned it to The Mosse Foundation on behalf of itself, University of Wisconsin, and Joy Mosse.

DATED: November 11, 2019

THE MOSSE FOUNDATION

By:



Roger Strauch, Trustee

VERIFICATION

I, Roger Strauch, as a Trustee of The Mosse Foundation, being duly sworn, deposes and states that:

I am a Trustee of The Mosse Foundation, a non-profit foundation established to hold and administer the assets of Hilde Mosse. I have read the attached CLAIMANT'S ANSWER TO VERIFIED COMPLAINT FOR FORFEITURE *IN REM* to the action *in rem* filed by United States of America. The facts as stated in the Answer are true to the best of my knowledge and belief, based upon knowledge possessed by me, and/or information obtained during the course of a lengthy investigation into the affairs of Felicia Lachmann-Mosse and Hans Lachmann-Mosse and the expropriation of their art collection by the Nazi regime in 1933.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Dated this 11 day of November, 2019 at Berkeley, California.



Roger Strauch

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Alameda

On November 11, 2019 before me, Karen Elaine Roland, Notary Public
 Date Here Insert Name and Title of the Officer

personally appeared Roger A Strauch
 Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Place Notary Seal and/or Stamp Above

Signature Karen Elaine Roland
 Signature of Notary Public

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

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Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian of Conservator

☐ Other: _____

Signer is Representing: _____

Signer's Name: _____

☐ Corporate Officer – Title(s): _____

☐ Partner – ☐ Limited ☐ General

☐ Individual ☐ Attorney in Fact

☐ Trustee ☐ Guardian of Conservator

☐ Other: _____

Signer is Representing: _____